Department of the Army Headquarters, US Army Joint Munitions Command 1 Rock Island Arsenal Rock Island, IL 61299-6000

OCT 0 2 2006

Logistics

INTERNATIONAL SHIPMENTS OF WOOD PACKING MATERIAL (WPM)

Applicability. This publication applies to all US Army Joint Munitions Command (JMC) Headquarters organizations and installations.

Supplementation. Supplementation of this regulation is authorized. Please send one copy to the proponent.

Proponent. The Industrial Support Directorate is the proponent. Users may send comments and recommendations to AMSJM-ISM, HQ JMC, 1 Rock Island Arsenal, Rock Island, IL 61299-6000, e-mail AMSJM-ISM@afsc.army.mil.

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Superseded publications. *AFSC Regulation 700-5, June 2005.

FOR THE COMMANDER:

Colonel, OD Acting Commander

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- 1. <u>Purpose</u>. This regulation prescribes policies and responsibilities for shipments of ammunition and other items from JMC installations using WPM. Specific, detailed guidance for inspection and documentation is also addressed. Adherence to requirements herein will ensure consistent and uniform action throughout the command.
- 2. Abbreviations and Terms. See the Glossary.

3. References.

- a. Memorandum, 13 February 2006, Deputy Under Secretary of Defense for Logistics and Material Readiness, Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders (see Appendix B.). This document serves as official DoD policy until the DoD Manual 4140.1 revision is finalized.
- b. DoD Manual 4140.1, Compliance for Defense Packaging, Phytosanitary Requirements for Wood Packaging Material (WPM). This manual is in the process of revision. When finalized, it will become official DoD policy guidance.
- c. International Standards for Phytosanitary Measures, Publication Number 15, March 2002 (see Appendix C).
 - d. SF 364, Supply Discrepancy Report.

4. Responsibilities.

- a. The JMC Munitions and Logistics Readiness Center (MLRC (AMSJM-MC)) has policy, management, and overall responsibility for matters pertaining to WPM.
- b. Each JMC installation/operation, Continental United States (CONUS), and Outside Continental United States (OCONUS) is responsible for implementing policies and procedures regarding WPM. The requirements include all (but not limited to) those described in this regulation and all applicable requirements of reference 3a above.
- c. The US Army Armament Research, Development and Engineering Center (ARDEC) Packaging Office (AMSRD-AAR-AIL-TP), located on Rock Island Arsenal, provides technical support to Army Sustainment Command (ASC) and JMC.

- d. The ASC Acquisition Center (AMSAS-AC) is responsible for inclusion of WPM requirements into each contract. The WPM requirements are provided by AMSRD-AAR-AIL-TP and are contained in Section D of the contract.
- 5. <u>Procedures</u>. For all WPM shipped across international borders, including all WPM that could be shipped internationally at some future date and including dunnage for blocking and bracing, comply with procedures in reference 3a above.
- a. Procurement of wood and wood products: All new WPM shall be compliant with International Standards for Phytosanitary Measures (ISPM) 15 standards to ensure it is pest free. Specifically, it must have undergone heat treatment that achieved wood core temperature of 56 degrees C for a minimum of 30 minutes or have been fumigated with methyl bromide. The wood or assembly shall be marked using the approved mark specified in ISPM 15, Annex II (reference 3c). For dunnage, marking shall be the approved American Lumber Standards Committee (ALSC) mark. For shipments that will not cross international borders, waivers can be requested from the ARDEC Packaging Office, AMSRD-AAR-AIL-TP.
- b. Receipt inspection: Incorporate the inspection of WPM as part of the ammunition receipt inspection process. If the wood packaging certification marking is not present, report non-compliance and determine disposition as follows:
- (1) Prepare SF 364 and cite improper packaging. Provide specific information about noncompliance in the remarks section.
- (2) Noncompliant WPM will be disposed of according to local laws or treated by an approved method to bring it into compliance.
- c. Documentation: Maintain documentation throughout the process of quantity of wood procured and used for each month. The WPM certification markings should be easily identifiable. Markings include the International Plant Protection Convention (IPPC) or DoD Pest Free marking. Monitor incoming WPM to ensure noncompliant WPM does not reenter supply system. Maintain a record of all discrepant receipts. Any repacking costs should be the responsibility of the last identified shipper/item manager.

- d. <u>DoD site certification</u>: As a minimum, each installation commander shall:
- (1) Establish a WPM point of contact that is responsible for maintaining WPM data for audit purposes.
- (2) Appoint WPM site custodians to ensure proper WPM procedures are conducted and proper markings are on WPM.
- (3) Maintain records, to include a copy of installation WPM guidelines, which shall adhere to this regulation.
- (4) Maintain documents pertaining to the number and use of DoD pest free marks from custodian at your location.
- (5) Ensure training is given and maintain records of individuals who have successfully completed training (Navy web site).
- (6) Maintain records of the board feet of heat treated lumber receipted and used on a monthly basis.
- (7) Maintain records of any corrective actions taken and reported failures against your site by an audit, shipping, or receiving activity.
 - (8) Maintain all records for at least 2 years.
- e. Certification markings: Apply appropriate certification markings as defined herein. Markings shall be indelible and permanent and should be stamped, stenciled, or branded directly onto or into the WPM. On pallets, apply the marking to the stringer or block on opposite sides or ends of the pallet, clearly visible. On containers, apply the marking to a side rather than on the top or bottom. On dunnage, apply the marking to opposite surfaces of each piece. When using lumber marked kiln dried (KD) and/or heat treat for dunnage, use the DoD approved ALSC mark. If possible, the markings should be visible when the dunnage is placed in the load to facilitate inspection of the WPM.
- f. Inspecting and marking of existing stock: All WPM in inventory as of 1 March 2005 that are not in compliance with IPPC standards and is destined for an European Union (EU) nation or nation that has not adopted the IPPC standard, and all retrograde, may be inspected and certified as pest free by following these procedures:

- (1) If the pack date is less than 5 years, inspect to ensure that the WPM:
 - (a) Is free of bark.
 - (b) Contains no bore holes larger than 3mm.
- (c) Has a moisture content of less than 20 percent (see Appendix A Criteria for Moisture Meters).
- (2) If the pack date is 5 years or older, inspect as in paragraph 5e(1) above, except there is no requirement for moisture reading.
- (3) If the WPM passes above inspection criteria, apply the DoD Pest Free mark displayed in Figure 1 of reference 3a. The mark shall display the letters "DoD," the words "Certified Pest Free," and the DoD Activity Address Code (DoDAAC). This will provide shippers and receivers the identification of the original packaging or shipping activity.
- (4) If the WPM does not pass inspection, it must be repacked into compliant WPM prior to shipment.
- (5) Expiration timeline for inspection process: This inspection procedure and DoD Pest Free marking is an interim exemption, granted only for WPM shipments into and among EU nations and is accepted by US Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), and US Customs and Border Patrol (CBP) for imports into the US of retrograde material packed in WPM. The DoD Pest Free stamp cannot be applied to WPM having a pack date later than 28 February 2005 per an EU notification to the World Trade Organization. After 31 December 2007, all WPM shipped into and among EU nations must meet ISPM 15 requirements. The DoD Pest Free stamp will no longer be acceptable for EU nations.

g. Fabrication and repair of WPM at DoD components:

- (1) Activities that build WPM according to ISPM 15, recognized USDA APHIS, or host country recognized programs, shall apply the IPPC mark.
- (2) Activities that repair WPM products utilizing compliant wood acquired commercially shall mark these repaired products with the IPPC mark, including their DoDAAC.

- (3) All DoD activities that have purchased and operate heat treat chambers shall be audited by an approved ALSC or host nation accredited agency. When the WPM is heat treated, the facility will apply the IPPC mark with the accredited agency's trademark. If located OCONUS and there is no host nation accrediting agency, apply DoD IPPC markings. If the facility is located in CONUS, it must be an ALSC quality mark.
- (4) Methylbromide fumigation is not the preferred method of WPM treatment, but it is an option. Fumigation shall be performed by a licensed pesticide applicator following US Environmental Protection Agency approved label specification for methylbromide. Methylbromide is the only fumigant approved for use. Fumigation requires a minimum of 16 hours to meet the requirement. Apply international mark to certify fumigated WPM.

h. Monthly reports:

- (1) DoD component activities shall provide monthly reports, coordinated through their chain of command, to the DoD centralized web site or other component specified reporting requirement. The reports must be posted to the DoD centralized web site or are due as specified in the other component specified reporting requirement within 2 weeks of the end of the reported month. The following reporting instructions, as a minimum, are required:
- (2) Activities using the DoD "Pest Free" certification will maintain records of certified material by documenting the following information: requisition or transportation control number, item national stock number (NSN), moisture reading, visually inspected for boreholes over 3mm in diameter and barkfree (Yes/No), quantity and type of WPM marked, inspector's signature verifying WPM meets DoD requirements and WPM is properly marked, and the date of certification. This information will be maintained at the activity level for verification during on-site audits. A monthly roll up of the number of instances, type and quantity of WPM certified DoD "Pest Free" will be provided as specified in paragraph 5g(1).
- (3) Activities fabricating new WPM or repairing WPM with new lumber and applying the IPPC certification mark will track the following:
- (a) Lumber receipts, including the receipt or requisition number, mill code, lumber MSN or identification number, lumber thickness, lumber width, lumber length, quantity

impartial inspectors. This option conforms to the procedures and/or information used by the ALSC. The DoD components electing this method shall comply with the following procedures:

- (3) On-line Report Validation. Reports for DoD activities authorized to apply the IPPC or DoD "Pest Free" mark shall be validated monthly using the current WPM standards.
- (a) Each reporting activity shall register their Department of Defense Activity Address Code (DoDAAC)/Unit Identifier Code (UIC) and site custodian via the web site.
- (b) Each validating activity shall register their DoDAAC/UIC and WPM Program Manager via the web site.
- (c) The WPM Program Manager or DoD Component POC shall validate the monthly reports (see paragraph 5h(1)).
- (4) On-Site Audits: Trained auditors shall perform annual on-site audits.
- (a) Auditors shall physically inspect DoD certified material stamped/stenciled with the IPPC mark or DoD "Pest Free" mark to ensure compliance.
- (b) Auditors shall document discrepancies and compliance data on line or forward to the WPM Program Manager or Component POC for comparison with on line/collected report verification data.
- (c) Auditors shall review the records of all incoming lumber, outgoing WPM, and shipments containing WPM, ensuring compliance.
- (d) Auditors shall review personnel training records verifying workers involved with WPM have successfully completed the DoD web based training course.
- (e) Auditors shall identify certification stamps are properly controlled.
- (f) Auditors shall provide detailed report of the audit and status of the DoD WPM Program through their chain of command WPM POCs to their DoD Component WPM POC. Auditors shall also monitor the records of all incoming and outgoing records, ensuring compliance and taking appropriate action as required.
 - (5) Consequences of Audit Failure/Noncompliance:

received, and date of receipt. This information will be maintained at the activity level for verification during on-site audits.

- (b) Lumber used, including the cut and fabrication work order number or other approved document number, lumber NSN or identification number, lumber thickness, lumber width, lumber length, number of boards of each size used, and date of fabrication. This information will be maintained at the activity level for verification during on-site audits.
- (c) A lumber usage report will be prepared identifying the lumber on hand at the beginning of the month, lumber received, lumber used, and final inventory of lumber on hand at the end of the month. This monthly roll up of lumber usage for IPPC certification will be provided as specified in paragraph 5h(1).

i. Audits:

- (1) The WPM audit program shall be maintained in compliance with the intent of current IPPC guidelines (reference 3c) and goals. To ensure correct and responsible use of the IPPC mark or the DoD "Pest Free" mark, DoD procedures to audit and inspect the DoD Certifying WPM program shall be observed.
- (2) Audit Methods: The DoD Components shall utilize one or more of the following methods for the auditing of their individual service/agency:
- (a) Facilities fabricating WPM from treated raw lumber may be audited and approved through the US program sanctioned by the USDA and administered by the ALSC.
- (b) Facilities treating WPM shall be audited and approved through the US program sanctioned by the USDA and administered by the ALSC or National Wood Pallet Container Association (NWPCA).
- (c) Audits conducted by the component command inspectors or auditors shall conform to the intent of procedures and/or information used by the ALSC.
- (d) Audits conducted using a combination of the DoD report program, as outlined in paragraph 5g(1), and on-site audits at major consolidation hubs, nodes, or sites. These audits shall be conducted using trained, independent, and

- (a) Commercial and Component Activities repairing or fabricating WPM to ALSC/NWPCA requirements shall receive warnings, suspensions and withdrawal of ALSC quality stamp marking privileges for noncompliance as specified in ALSC/NWPCA enforcement regulations.
- (b) At DoD site-certified WPM activities, audit failures (nonconformance to WPM requirements at an aerial or shipment ports, or container consolidation point (CCP)), or reported and validated shipping discrepancies shall apply.
- (c) First Audit Failure/Reported Noncompliance: After notification of an audit failure, the site custodian shall, within 15 days, provide written analysis of problem and proposed solution to the responsible auditing organization and to the WPM Component POC. The site shall be re-audited within 30 days to determine if process improvements have been implemented and are sufficient to resolve the discrepancy.
- (d) Second Audit Failure/Reported Noncompliance: For an audit failure within the 30 days, within 15 days of the second failure, provide written analysis of problem and proposed solution to the responsible auditing organization and to the WPM Component POC. The site shall be re-audited within 60 days by the WPM Program Manager or WPM Component POC to determine if process improvements have been implemented and are sufficient to resolve the discrepancy.
- another audit failure within the 60 days: If the breakdown is the result of a failure to maintain required documentation or to contract for the delivery of the proper WPM, the DoD site certification may be withdrawn. If certification is withdrawn, then the facility shall contact ALSC for monthly commercial inspections, contract with a local ALSC operation, or send material to another DoD self-certified site. The facility shall be responsible for all costs associated with actions from a third failure. If the failure is related to the shipment of defective packaging, the installation/shipper shall be responsible for repack costs and/or the demurrage costs and all installation personnel shall have their certifications removed and shall be required to retake the WPM certification on line training prior to being authorized to use the permanent mark.

- (f) After 1 year, the site may reapply for DoD site recertification. All wood fabricators/packers shall retake the individual certification test for site wood packaging recertification.
- j. Army Prepositioned Stocks (APS): During routine maintenance cycles of APS vessels, the items are repacked, inspected, and certified as identified in paragraph 5c above. The APS material currently prepositioned overseas does not require inspection or repack until such time that they will be shipped to another country. At that time, follow procedures in paragraph 5c above. Item managers of CONUS-based APS material and operational projects shall ensure this material is compliant.

Appendix A

CRITERIA FOR MOISTURE METERS

- 1. Should be pin (probe) type of meter. Safety of radio frequency models cannot be verified for all ammunition. Hammer type probes are recommended for greater durability but are not mandatory.
- 2. Should have species correction. A chart for conversion from instrument reading to moisture content will come with the product. Models that don't require this step are less accurate.
- 3. Should have temperature correction. Models without are less accurate.
- 4. Should have accuracy of 2 percent moisture content or better.
- 5. Should be able to read a moisture range of 6-25 percent.
- 6. Should be able to recharge the model by battery replacement or other means.

APPENDIK B



DEPUTY UNDER SECRETARY OF DEFENSE FOR LOGISTICS AND MATERIEL READINESS 3500 DEFENSE PENTAGON WASHINGTON, DC 20301-3500

FEB | 3 2006

MEMORANDUM FOR DEPUTY CHIEF OF STAFF FOR LOGISTICS, G-4, U.S. ARMY

DIRECTOR OF MATERIAL READINESS AND LOGISTICS
OFFICE OF THE CHIEF OF NAVAL OPERATIONS
DEPUTY CHIEF OF STAFF FOR INSTALLATIONS AND
LOGISTICS, U.S. AIR FORCE
DEPUTY COMMANDANT FOR INSTALLATIONS AND
LOGISTICS, U.S. MARINE CORPS
DIRECTOR FOR LOGISTICS, JOINT STAFF
DIRECTOR, DEFENSE LOGISTICS AGENCY
DIRECTOR, DEFENSE CONTRACT MANAGEMENT
AGENCY

SUBJECT: Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders

This memorandum provides policy guidance to the Military Services on the certification of raw wood products used for the protection and preservation of DoD cargo to enable movement of the cargo across international borders without disruption. This policy was developed in response to international implementation of the United Nations (UN) Food and Agriculture Organization (FAO) protocol on International Standards for Phytosanitary Measures (ISPM) 15. ISPM 15 is a protocol designed to block movement of pests that can destroy forests from one nation to another.

Under the provisions of ISPM 15, any improperly marked or untreated wood product is subject to seizure at the border of any nation enforcing the UN FAO ISPM protocol. The cargo must then be repackaged at the shipper's expense or it may be rejected and ordered to be returned to country of origin. The attached guidance provides methods, when implemented, that will ensure that DoD cargo will meet international requirements.

The interim policy requires the Services to test, treat and phase-out all non-compliant WPM over time. The cost to each Service is estimated at \$600,000 per year for packaging/repackaging materiel and for development and maintenance of a web-based auditing/monitoring program which is require to meet ISPM standards. This interim policy is effective for 6 months from the date of signature or until a DoD Manual on WPM is published, whichever comes first.

ack Bell

Attachment: As stated



References:

- (a) International Standards for Phytosanitary Measures (ISPM) Number 15, Guidelines for Regulating Wood Packaging Material in International Trade, United Nations (UN), Food and Agriculture Organization (FAO)
- (b) Federal Regulations Part 319, 7 Code, Importation of Wood Packaging Material
- 1. PURPOSE: Consistent with the international standards for the regulation of Wood Packaging Material (WPM) transiting international borders, reference (a), and implementation of Department of Agriculture regulations governing importation of regulated WPM, reference (b), this interim policy:
- 1.1. Delegates authority, establishes policy, and assigns responsibilities for the management of WPM in peacetime and across the spectrum of military operations.
- 1.2. Designates the Office of the Assistant Deputy Under Secretary of Defense (Supply Chain Integration) as the DoD focal point for WPM.
- 1.3. Identifies the roles and responsibilities of the Military Departments and Defense Agencies.
- 2. APPLICABILITY AND SCOPE: This interim policy:
- 2.1. Applies to the Office of the Secretary of Defense, the Military Departments, the Chairman of the Joint Chiefs of Staff, the Combatant Commands, the Office of the Inspector General of DoD, the Defense Agencies, the DoD Field Activities, and all organizational entities in DoD (hereafter referred to collectively as the "DoD Components").
- 2.2. Applies to all DoD Components that use regulated WPM such as those engaged in logistical functions supporting elements of the U.S. Armed Forces.
- 3. DEFINITIONS: (See enclosure)

4. POLICY:

- 4.1. Phytosanitary requirements for WPM imposed by the UN guidelines (reference (a)) protect forests worldwide against pest infestation. DoD Components engaged in packaging of materiel for transnational shipments shall comply with this interim guidance in order to gain access to aerial and water ports. If these procedures are not followed, there is a strong risk improperly marked materiel will become frustrated cargo, destroyed at the port, or be required to be repacked at the port of debarkation, causing increased cost and time delays to DoD.
- 4.2. These DoD WPM procedures are intended to be applied consistent with the Animal and Plant Health Inspection Service (APHIS) regulations (reference (b)). The

intent is to treat, test or phase-out all non-compliant WPM over time. WPM includes pallets, crates, boxes, and reels and dunnage composed of non-manufactured wood. Some examples of manufactured wood products not affected are plywood, particleboard, and finished woods used in furniture, etc. Sources, shippers, and receivers in the DoD Components' supply chain shall be responsible for identifying, replacing, and the remediation of non-compliant WPM. DoD shipments coming from countries that are not IPPC signatories shall comply with the DoD provisions of this interim guidance and implementation by DoD Components.

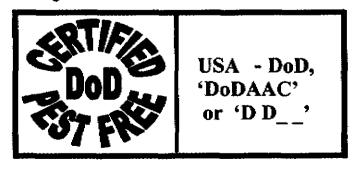
5. RESPONSIBILITIES:

- 5.1. New WPM. New WPM acquired by DoD Components shall be compliant with ISPM 15 standards (reference (a)). Within the United States, the DoD Components shall also adhere to the American Lumber Standard Committee (ALSC) and the National Wood Pallet and Container Association (NWPCA), guidelines on "Pest Free" WPM. In overseas areas, DoD Components shall procure all WPM in compliance with host nation implementation of UN IPPC phytosanitary standards (reference (a)), if such standards have been implemented.
- 5.2. Existing WPM. DoD Components shall prevent non-compliant WPM from entering the inventory. Non-compliant WPM shall be remediated into compliance by taking actions needed to allow application of the DoD mark or IPPC international mark, by the most economic means, prior to entering the Defense Transportation System (DTS). The DoD Components shall remediate non-compliant WPM before it enters the DTS. Prior to shipment, DoD Components shall inspect, treat, replace, or repack non-compliant WPM using the most economical solution that meets the required delivery date.
- 5.3. Shipment Inspection. The DoD Components shall visually inspect incoming shipments for DoD or international wood packaging certification marking. If marking is not present, report the non-compliance and determine disposition as stated below.
- 5.3.1. Report Non-Compliance. For shipments determined to be non-compliant, prepare an SF 364, Supply Discrepancy Report (SDR), per the Joint Service Instruction/Regulation DLAI 4140.55A/AR 735-11-2/SECNAVINST 4355.18A/AFJMAN 23-215, Reporting of Supply Discrepancies. Cite "Improper Packaging" and/or "Improper Packing" on the SF 364. Provide specific non-compliant information in the remarks section. Complete an SF 1080, Voucher for Transfers between Appropriations and/or Funds. If possible, attach photographic evidence to substantiate the claim for the recoupment of funds expended in bringing the shipment into compliance.

- 5.3.2. Determine Disposition.
- 5.3.2.1. Compliant WPM. If the reusable shipping and storage container is compliant, the container shall be utilized for return of approved items. Other compliant WPM shall be recycled and reused in local applications (i.e., packing and shipping operations). Compliant WPM that cannot be recycled shall be properly disposed of under host nation laws and governing DoD or Military Service regulations.
- 5.3.2.2. Non-Compliant WPM. Non-compliant WPM shall be disposed of as required under host nation laws or treated by one of the two approved methods to bring the WPM into compliance.
- 5.3.2.3. Local Service Contract for Disposition. In locations where non-compliant WPM cannot be remediated the material shall be disposed of by a local service contracts, if necessary.
- 5.4. Documentation. The DoD Components shall maintain documentation throughout the process. WPM certification markings shall allow easy identification of compliant WPM. Markings include the international IPPC or DoD "Pest Free" certification markings. The DoD Components shall monitor all incoming WPM to ensure non-compliant serviceable WPM shall not re-enter the supply system. The DoD Components shall maintain a record for all discrepant receipts and a SDR prepared and forwarded to the shipping activity for corrective action and trend analysis. DoD Components can reuse non-compliant WPM after processing it through a certified heat chamber and applying the proper markings, or perform the inspection and apply the DoD "Pest Free" certification marking. If circumstances preclude the use of a heat chamber, alternate processes are available with prior approval. If reuse is not feasible, WPM shall be disposed of using environmentally safe methods. Repacking and disposal costs associated with non-compliant WPM receipts shall be the responsibility of the owner of the stock directing shipment (i.e. last identified shipper or item manager).
- 5.5. DoD Site Certification. To be considered a DoD certified WPM site, the installation commander shall:
 - 5.5.1. Establish a WPM focal point at each local certified site. The focal point shall be responsible for maintaining WPM data for audit purposes.
 - 5.5.2. Appoint WPM site "DoD Pest Free" and international certification mark custodians.
 - 5.5.3. Maintain international and DoD "pest free" certification records. The records shall include:
 - 5.5.3.1. A copy of the DOD Component's specific WPM implementation guidelines.

- 5.5.3.2. Documents pertaining to the number and use of DoD "pest free" marks using stamps provided by the DoD Stamp Administrator.
- 5.5.3.3. A list of individuals who successfully completed the DOD WPM Self Certification training (Navy web site).
- 5.5.3.4. The board feet amount of heat treated (HT) lumber receipted for and used on a monthly basis.
- 5.5.3.5. The inspection, testing, and marking of existing WPM in accordance with the DOD Phytosanitary requirements for WPM.
- 5.5.4. Document Retention. WPM records retention at each certified site shall be for a period of not less than two years. DoD Components may specify retention requirements for other documents or records. On-site audits shall review all of the above for completeness and accuracy.
- 5.6. Certification Markings. DoD Components shall apply appropriate certification markings as required and defined herein. Certification markings shall be indelible and permanent. They may be stamped, stenciled, or branded directly onto or into the WPM. On pallets, the marking shall be applied to the stringer or block on opposite sides or ends of the pallet and be clearly visible. On containers, the marking shall be applied on a side other than the top or bottom and clearly visible. If possible, these markings should be adjacent to the container identification markings. On dunnage, the marking shall be applied to opposite surfaces of each piece. If possible, the mark shall be visible when the dunnage is placed in the load to enable inspectors to verify the WPM's compliance without unloading or unstuffing the container.
- 5.6.1. DoD "Pest Free" Mark. All WPM in DoD inventories as of March 1, 2005, that are not in compliance with UN IPPC standards (reference(a)), but have passed the moisture test and visual inspection standards, below, may be stamped, stenciled, or branded with the DoD "Pest Free" mark. The DoD "Pest Free" marking shall display the letters "DoD", the words "Certified Pest Free", and the Department of Defense Activity Address Code (DoDAAC) (see Figure 1).

Figure 1. DoD "Pest Free" Certification Mark



The DoDAAC or DDC code provides receivers and shippers of DoD stock with the identification of the original packaging or shipping activity. Apply this mark only in those instances where the preparing activity inspects existing stock prior to shipment to ensure that the WPM being used for shipment successfully passed the moisture content test and visual inspection criteria.

- 5.6.1.1. Inspection of Existing Stock. Inspect existing WPM for compliance using the following moisture test and visual inspection standards. If the pack date is less than five years and is not packaged in compliant WPM, it shall be inspected to ensure the WPM is bark free, contains no bore holes larger than 3mm, and the moisture content is less than 20 percent. If the pack date is five years or older, it shall be inspected ensuring the WPM is bark free, contains no bore holes larger than 3mm, and no evidence of other pest infestation. When packaging is inspected and found compliant, it shall be marked as pest free with the DoD pest free mark. The IPPC international mark may not be used for this inspection and certification scheme. All inspection criteria must be met or the packaging is considered non-compliant and remedial action shall be performed.
- 5.6.1.2. Exemption Timeline. This inspection process and marking is an interim exemption only for WPM shipments into and among the European Community (EC) nations and is accepted by USDA APHIS and U.S. Customs and Border Patrol (CBP) for imports into continental United States (CONUS) of retrograde materiel packed in WPM. The EC nations initiators of WPM infestation treatment and markings, allowed the U.S. DoD time to either use or methodically and cost effectively repack materiel in long-term storage into acceptable WPM. The DoD "Pest Free" stamp cannot be applied to DoD WPM having a date of pack later than February 28, 2005, per an EC notification to the World Trade Organization. After December 31, 2007, all DoD WPM shipped into, or amongst EC member nations must meet ISPM 15 requirements, as the DoD "Pest Free" stamp will no longer be an acceptable export shipment marking for WPM compliance.
- 5.6.2. International Certification Mark. DoD Components that are self-certified and audited per this memorandum, or are using an accredited host nation National Plant Protection Organization (NPPO) WPM service provider, or are American Lumber Standards Committee (ALSC) accredited, are authorized to use the UN International mark on all WPM that fully complies with the IPPC guidelines in reference (a). The DoD International certification marking authorized by the UN, shall display the letters "US" in bold, the packaging activities DODAAC or DDC code (e.g., DDSP, DDJC, etc.), and either "HT" denoting Heat Treated WPM or "MB" denoting WPM treated or "fumigated" with Methyl Bromide shall be inserted as applicable as noted in the Figure 2 by "YY." The marking "DOD", representing the logo of the U.S. services can be displayed under the DODAAC.

Apply the international mark when:

Figure 2. International Certification Mark



Notes: a. Trademark - the identifying symbol, logo, or name of the accredited agency

- b. Facility Identification the packaging activity's DODAAC or DDC code (e.g., DDSP, DDJC, etc.)
- c. Heat Treated or Methyl Bromide mark
- d. Country Code US
- e. Approved International symbol for compliant wood packaging material
- f. Used strictly for dunnage, otherwise left blank.
- 5.6.2.1. WPM New Fabrication. DoD activities assemble or build WPM in accordance with ISPM 15, recognized USDA APHIS, or host NPPO country recognized programs, which are acceptable for importation into the US. Certified wood procured commercially and the containers, paliets, etc., constructed from that wood shall display the IPPC mark.
- 5.6.2.2. WPM Repair. DoD activities construct or repair WPM products utilizing compliant wood acquired commercially shall mark the products they construct or replacement wood using the DoD international mark, treatment code, and their DoDAAC. This only applies to repairs if the entire original WPM product was in compliance with ISPM 15. Existing DoD WPM inventory that is repaired using compliant wood and that is unmarked or marked with the unique DoD "Pest Free" mark shall NOT be marked with the international mark because such WPM product is not compliant with the UN IPPC guidelines. The DoD "Pest Free" mark will be used if necessary (see 5.6.1).
- 5.6.2.3. Kiln Drying Operations. The DoD primary method of WPM compliance is HT. The DoD does not process raw lumber through heat chambers. All DoD activities that have procured and trained personnel to operate wood HT chambers or kilns to process lumber or WPM products (e.g., wooden boxes, pallets, skids, drums, etc.) to UN IPPC standards (56° C (core temperature) for minimum of 30 minutes) shall be enrolled with and audited by an approved ALSC or host nation accredited agency. As part of the contract, the accredited agency furnishes that activity with the agency's ALSC or host nation-approved WPM stamp for certification purposes. When WPM is heat treated, the treating facility shall apply

their respective international mark. If located on an outside CONUS (OCONUS) site and the host nation does not have an NPPO or IPPC WPM Program, the DoD activity shall self-certify and mark lumber and WPM that has been HT in a heat treatment chamber or kiln with the DoD markings.

- 5.6.2.4. Methyl Bromide Fumigation. Fumigation is an authorized treatment of WPM, although DoD does not recommend this option. The USDA APHIS has given the responsibility for fumigation compliance of the WPM UN IPPC guidelines to NWPCA. The NWPCA Enforcement Committee compliance memorandum dated September 27, 2002 is available through the http://www.nwpca.com/ web site. Fumigation in the United States shall be performed by a licensed pesticide applicator following U.S. Environmental Protection Agency-approved label specification of the fumigant used. Methyl bromide is the only fumigant authorized for program use. Fumigated WPM is to be certified with the international mark. Service approval is required for use of this process.
- 5.6.2.5. Chemical Pressure Impregnation (CPI). DoD does not recognize this option.
- 5.6.2.6. Other Preservative Treatments. Wooden boxes, crates, pallets, etc., may require the application of an additional preservative to meet storage or environmental requirements. Many ammunition boxes and pallets require a wood preservative and a specific marking to identify the preservative used (i.e., PA, PB, or PC). Heat treatment and its certification marking shall take place prior to any additional preservation application.
- 5.7. Shipment. The DoD Components shall ensure 100 percent compliance with the measures and standards regarding shipments of WPM. If the consignor's inspection indicates the WPM is not in compliance with UN IPPC guidelines (reference(a)), the materiel shall not be offered for shipment. The shipper shall evaluate and select one of the compliance options to meet the WPM UN IPPC guidelines. In the event shipments are frustrated by a member state (nation), the carrier (military or commercial) shall notify the consignor (shipper) and/or consignee (addressee) to determine required actions. At this point, DoD shall exercise actions and/or options depending on the circumstances of the quarantined/frustrated shipment (i.e. member nation procedures/requirements, amount of WPM involved, value and priority of shipment, and DoD presence/non-presence at port of debarkation (POD), location of consignee). Remediation costs shall be recouped from the last identified shipper or owner of the materiel.
 - 5.7.1. Remediation. Remediate frustrated shipments depending on circumstances, carrier policies/procedures, and member/host state requirements. Options include:
 - 5.7.1.1. Inspect, certify, and mark at POD. Contingent upon capabilities of POD personnel providing the appropriate level of expertise.

- 5.7.1.2. Replacement. If WPM can not be remediated, replace the non-compliant wood. If the capability and capacity exists for repackaging at the POD, and it is authorized by the host/member nation, shipments shall be repackaged and forwarded to the final destination. An SDR shall be prepared and the shipper shall reimburse the repackaging costs. Non-compliant WPM shall be disposed of in accordance with local procedures. If required, the last identifiable shipper or materiel owner shall pay disposal costs.
- 5.7.1.3. Consignee pick-up of shipment at POD. If authorized by member/host nation authorities and the consignee is able to pick up the shipment at the POD, consignee may remove the non-compliant WPM, transport the shipment to its destination and dispose of the non-compliant WPM in accordance with local procedures.
- 5.7.1.4. Return to origin. If the above options are not feasible, the shipment shall be returned to the shipper, at their expense, in accordance with carrier policies and procedures.
- 5.7.2. Reporting. Shipments frustrated at POD or any reports of non-compliance requiring intervention shall be reported to combatant command/agency components, the consignee, and consignor. If the level of frustrated shipments reaches an unacceptable level, the above shall notify the U.S. Transportation Command for further action.
- 5.8. Management Controls. The DoD Components shall report, audit, and enforce WPM standards and measures. Audit and enforcement management shall use a centralized web site and include on-site inspections or other Component specified reporting requirement. Each Activity certifying WPM shall be audited in accordance with the following DoD audit procedures.
- 5.8.1. Reports. DoD Component activities shall provide monthly reports, coordinated through their chain-of-command, to the DoD centralized web site or other Component specified reporting requirement. The reports must be posted to the DoD centralized web site or are due as specified in the other Component specified reporting requirement within two weeks of the end of the reported month. The following reporting instructions, as a minimum, are required:
 - 5.8.1.1. Activities using the DoD "Pest Free" certification will maintain records of certified materiel by documenting the following information: requisition number, item national stock number (NSN), moisture reading, visually inspected for boreholes over 3 mm in diameter (Yes/No), quantity of WPM marked, inspector's signature verifying WPM meets DoD requirements and WPM is properly marked, and the date of certification. This information will be maintained at the activity level for verification during on-site audits. A monthly roll up of the number of instances and quantity of WPM certified DoD "Pest Free" will be provided as specified in paragraph 5.8.1.

- 5.8.1.2. Activities fabricating new WPM or repairing WPM with new lumber and applying the international certification mark will track the following:
 - 5.8.1.2.1. Lumber receipts including the receipt or requisition number, mill code, lumber NSN or identification number, lumber thickness, lumber width, lumber length, quantity received, and date of receipt. This information will be maintained at the activity level for verification during on-site audits.
 - 5.8.1.2.2. Lumber used including the cut and fabrication work order, lumber NSN or identification number, lumber thickness, lumber width, lumber length, quantity received, and date of fabrication. This information will be maintained at the activity level for verification during on-site audits.
 - 5.8.1.2.3. A lumber usage report will be prepared identifying the lumber on hand at the beginning of the month, lumber received, lumber used, and final inventory of lumber on hand at the end of the month. This monthly roll up of lumber usage for International certification will be provided as specified in paragraph 5.8.1.
- 5.8.2. Audits. DoD audit procedures have been developed to effectively monitor, enhance, and ensure compliance in a positive way. Audits complying with the DoD Certifying WPM Program will be further defined in each DoD component's internal instruction. Minimum required information for auditing, as well as construction and inventory, is detailed in the Self Certification Course that is resident on the DoD WPM web site (The Naval Inventory Control Point (NAVICP) Code 07 web site: https://www.icptarp.net/wpm/wpm_training.nsf/wpm+home?openpage). Each DoD Component has the authority to elect to utilize one or more of the following methods for the auditing of their individual Service/Agency as are compatible with their requirements.
 - 5.8.2.1. Facilities treating WPM shall be audited and approved through the U.S. program sanctioned by the USDA and administered by the ALSC or NWPCA.
 - 5.8.2.2. Audits conducted by the DoD Component command inspectors or auditors shall use, to the extent feasible, the procedures and information used by ALSC.
 - 5.8.2.3. Audits conducted using a combination of the DoD on-line report validation program coupled with on-site audits at major consolidation hubs or nodes shall be conducted using trained inspectors who are independent of the packaging and crating operation. This conforms to the procedures and information used by the ALSC. Components electing this method shall comply with the following procedures:

- 5.8.2.3.1. On-line Report Validation. Participating DoD activities authorized to use either the international or DoD "Pest Free" certification marks shall submit monthly usage reports which will be validated monthly using the current WPM standards published on the DoD WPM web site.
 - 5.8.2.3.1.1. Each participating activity shall register their DoDAAC/UIC and Site Custodian Point of Contact (POC) via the DoD WPM web site.
 - 5.8.2.3.1.2. Each validating Activity shall register their DoDAAC/UIC and WPM Program Manager via the web site.
 - 5.8.2.3.1.3. The WPM Program Manager or DoD Component POC shall validate the monthly reports (see paragraph 5.8.1)
 - 5.8.2.3.1.4. The activity POC shall attach and forward required records to the service/agency WPM program manager (PM) for evaluation.
- 5.8.2.3.2. On-Site Audits. Trained auditors who are independent of the packaging and crating operations shall perform annual on-site audits. Auditors shall:
 - 5.8.2.3.2.1. Physically inspect DoD Certified material stamped/stenciled with the international or DoD "Pest Free" marks to ensure compliance.
 - 5.8.2.3.2.2. Document discrepancies or compliance data and forward to the service/agency WPM PM for comparison with on-line/collected audit verification data.
 - 5.8.2.3.2.3. Review the records of all incoming lumber, outgoing WPM, and shipments containing WPM ensuring compliance and take appropriate action as required.
 - 5.8.2.3.2.4. Review personnel training records verifying workers involved with WPM have successfully completed the DoD web based training course.
 - 5.8.2.3.2.5. Identify certification stamps are properly controlled.
 - 5.8.2.3.2.6. Provide detailed report of the audit and status of the DoD WPM Program through their chain-of-command WPM POCs to their DoD Component WPM POC.

- 5.8.3. WPM On-line Automation Tools.
- 5.8.3.1. Standardization of Forms/Data. All appropriate forms are available to be downloaded from the DoD web site. The DoD WPM web site is the central point for training, monitoring, auditing, and certification of DoD and contractor personnel.
- 5.8.3.2. Audit Results Reporting. Each DoD Component activity performing WPM certification shall be provided with a link for review of verification results. Audited organizations shall be provided with results and constructive recommendations when required. An annual summary report shall be provided to each DoD Component representative.
 - 5.8.4. Consequences Of Audit Failure/Non-Compliance.
- 5.8.4.1. Commercial and DoD Component activities repairing or fabricating WPM to ALSC/NWPCA requirements shall receive warnings, suspensions and withdrawal of ALSC quality stamp marking privileges for non-compliance as specified in ALSC/NWPCA enforcement regulations.
- 5.8.4.2. At DoD site-certified WPM activities (see 5.5 above), the following procedures apply to audit failures (non-conformance to WPM requirements at an aerial or shipment ports, or CCP), or reported valid non-compliance:
 - 5.8.4.2.1. First Audit Failure/Reported Non-Compliance. After notification of the first audit failure/non-compliance, the site WPM mark custodian shall, within fifteen days, provide written analysis of problem and proposed solution to the responsible auditing organization and to the DoD Component's POC (representative to the Defense Packaging Policy Group (DPPG)). The site shall be re-audited within thirty days to determine if process improvements have been implemented and are sufficient to resolve the discrepancy.
 - 5.8.4.2.2. Second Audit Failure/Reported Non-Compliance. A second audit failure/non-compliance within the thirty days requires more involvement as follows:
 - 5.8.4.2.2.1 Within fifteen days of the second failure provide written analysis of problem and proposed solution to the responsible auditing organization (see Section 5.8 above) and to the WPM Component POC.
 - 5.8.4.2.2.2 The site shall be re-audited within sixty days by the WPM Program Manager or WPM Component POC to

determine if process improvements have been implemented and are sufficient to resolve the discrepancy.

- 5.8.4.2.3 Third Audit Failure/Reported Non-Compliance. Another audit failure within the 60 days:
 - 5.8.4.2.3.1. If the breakdown is the result of a failure to maintain required documentation or to contract for the delivery of the proper WPM, the DoD site certification may be withdrawn. The facility shall contact ALSC for monthly commercial inspections, contract with a local ALSC operation, or send materiel to another DoD self-certified site. The facility shall be responsible for all costs associated with actions from a third failure.
 - 5.8.4.2.3.2. If the failure is related to the shipment of defective packaging, the installation/shipper shall be responsible for repack costs and/or the demurrage costs, all installation personnel may have their certifications removed and shall be required to retake the WPM certification on-line training prior to being reauthorized to apply use the certification marks.
 - 5.8.4.2.3.3. After one year, the site may reapply for DoD site certification. All wood fabricators/packers shall retake the individual certification test for site wood packing re-certification.
- 5.9. Training. The DOD Components shall utilize the DoD comprehensive WPM web based training course. The site address is: https://www.icptarp.net/wpm/wpm_training.nsf/wpm+home?openpage. This course is available to all Services, Military, DOD civilian, and contractor personnel operating Government Owned, Contractor Operated (GOCO) facilities. The course addresses and provides self-certification and familiarization training. This course covers current WPM UN IPPC guidelines. The course is divided into six sections. After each section a short quiz is given to review the information provided. At the end of the six sections, personnel shall successfully complete an in-depth final examination. Personnel shall undergo refresher training once every two years. This practice shall ensure packers, wood fabricators, and assemblers stay current with UN IPPC, APHIS, and DOD WPM policy and procedural changes.
- 6. EFFECTIVE DATE: This interim policy is effective for six months from the date of signature or until a DoD Manual on WPM is published, whichever comes first.

DEFINITIONS/TERMS OF REFERENCE

- D.1. American Lumber Standard Committee (ALSC). The ALSC, comprised of manufacturers, distributors, users, and consumers of lumber, serves as the standing committee for the American Softwood Lumber Standard (Voluntary Product Standard 20) and in accordance with PS 20, administers an accreditation program for the grade marking of lumber produced under the system. The ALSC also administers accreditation programs for the quality marking of treated lumber produced under standards written and maintained by the American Wood Preserver's Association (AWPA) and for the labeling of wood packaging material.
- **D.2.** Bark-Free Wood. Wood from which all bark excluding the vascular cambium, ingrown bark around knots, and bark pockets between rings of annual growth has been removed [ISPM Pub. N° 15, 2002].
- **D.3.** Dunnage. WPM used to secure or support a commodity but which does not remain associated with the commodity [FAO, 1990; revised ISPM Pub. N° 15, 2002].
- **D.4.** International Plant Protection Convention (IPPC). An international treaty relating to plant health, to which 141 governments, including the U.S.A., currently adhere. Its main purpose is to secure action to prevent the spread and introduction of pests of plants and plant products, and to promote appropriate measures for their control.
- **D.5.** International Standard for Phytosanitary Measure. Reference (a) which is international standard adopted by the Conference of Food and Agriculture Organization (FAO), the Interim Commission on Phytosanitary measures or the Commission on Phytosanitary measure, established under IPPC.
- D.6. National Wooden Pallet & Container Association (NWPA). The international trade association that represents manufacturers, recyclers, and distributors of pallets, containers, and reels.
- **D.7.** Phytosanitary. Plant health including the protection of natural flora and plant products including direct and indirect damage by pests.
- **D.8. Phytosanitary action.** An official operation, such as inspection, testing, surveillance or treatment, undertaken to implement phytosanitary regulations or procedures [ICPM, 2001].
- **D.9. Processed wood material.** Products that are a composite of wood constructed using glue, heat and pressure, or any combination thereof [ISPM Pub. N° 15, 2002] Examples are plywood, particleboard, oriented strand board, veneer, wood wool, etc.
- **D.10.** Wood Packaging Material (WPM). Wood or wood products (excluding paper products) used in supporting, protecting, or carrying a commodity (includes dunnage)

[ISPM Pub. N° 15, 2002]. Examples of WPM include but are not limited to pallets, skids, pallet collars, containers, crates, boxes, cases, bins, reels, drums, load boards, and dunnage. Wood packaging made of exempt materials but combined with solid wood components must still be treated and marked. Does not include processed wood materials and manufactured wood products. (WPM was previously known as Non-Manufactured Wood Packaging or Solid Wood Packaging Material)

D.11. WPM Compliance. Complying with reference (b), this interim policy and, as applicable, implementation of reference (a) by U.S. allies, and other friendly governments.

APPENDIX C

International Standards for Phytosanitary Measures

INTERNATIONAL STANDARDS FOR PHYTOSANITARY MEASURES

GUIDELINES FOR REGULATING WOOD PACKAGING MATERIAL IN INTERNATIONAL TRADE



Secretariat of the International Plant Protection Convention Food and Agriculture Organization of the United Nations Rome, 2002 The designations employed and the presentation of material in this publication do not imply the expression of any opinion whatsoever on the part of the Food and Agriculture Organization of the United Nations concerning the legal status of any country, territory, city or area or of its authorities, or concerning the delimitation of its frontiers or boundaries.

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Endorsement

International standards for phytosanitary measures are prepared by the Secretariat of the International Plant Protection Convention as part of the United Nations Food and Agriculture Organization's global programme of policy and technical assistance in plant quarantine. This programme makes available to FAO Members and other interested parties these standards, guidelines and recommendations to achieve international harmonization of phytosanitary measures, with the aim to facilitate trade and avoid the use of unjustifiable measures as barriers to trade.

This standard was endorsed by the Interim Commission on Phytosanitary Measures in March 2002.

Jacques Diouf
Director-General
Food and Agriculture Organization of the United Nations

Application

International standards for phytosanitary measures (ISPMs) are adopted by contracting parties to the IPPC, and by FAO Members that are not contracting parties, through the Interim Commission on Phytosanitary Measures. ISPMs are the standards, guidelines and recommendations recognized as the basis for phytosanitary measures applied by Members of the World Trade Organization under the Agreement on the Application of Sanitary and Phytosanitary Measures. Non-contracting parties to the IPPC are encouraged to observe these standards.

Review and amendment

International standards for phytosanitary measures are subject to periodic review and amendment. The next review date for this standard is 2007, or such other date as may be agreed upon by the Commission on Phytosanitary Measures.

Standards will be updated and republished as necessary. Standard holders should ensure that the current edition of this standard is being used.

Distribution

International standards for phytosanitary measures are distributed by the Secretariat of the International Plant Protection Convention to all FAO Members, plus the Executive/Technical Secretariats of the Regional Plant Protection Organizations:

- Asia and Pacific Plant Protection Commission
- Caribbean Plant Protection Commission
- Comité Regional de Sanidad Vegetal para el Cono Sur
- Comunidad Andina
- European and Mediterranean Plant Protection Organization
- Inter-African Phytosanitary Council
- North American Plant Protection Organization
- Organismo Internacional Regional de Sanidad Agropecuaria
- Pacific Plant Protection Organization.

INTRODUCTION

SCOPE

This standard describes phytosanitary measures to reduce the risk of introduction and/or spread of quarantine pests associated with wood packaging material (including dunnage), made of coniferous and non-coniferous raw wood, in use in international trade.

REFERENCES

Agreement on the Application of Sanitary and Phytosanitary Measures, 1994. World Trade Organization, Geneva.

Export certification system, 1997. ISPM Pub. No. 7, FAO, Rome.

Glossary of phytosanitary terms, 2001. ISPM Pub. No. 5, FAO, Rome.

Guidelines for phytosanitary certificates, 2001. ISPM Pub. No. 12, FAO, Rome.

Guidelines on notification of non-compliance and emergency action, 2001. ISPM Pub. No. 13, FAO, Rome.

ISO 3166-1-ALPHA-2 CODE ELEMENTS

(http://www.din.de/gremien/nas/nabd/iso3166ma/codlstp1/en_listp1.html)

International Plant Protection Convention, 1997. FAO, Rome.

Principles of plant quarantine as related to international trade, 1995. ISPM Pub. No. 1, FAO, Rome.

DEFINITIONS AND ABBREVIATIONS

bark-free wood Wood from which all bark excluding the vascular cambium,

ingrown bark around knots, and bark pockets between rings of annual growth has been removed [ISPM Pub. No. 15, 2002]

chemical pressure

impregnation

Treatment of wood with a chemical preservative through a process of pressure in accordance with an officially recognized

technical specification [ISPM Pub. No. 15, 2002]

certificate An official document which attests to the phytosanitary status

of any consignment affected by phytosanitary regulations

[FAO, 1990]

commodity A type of plant, plant product, or other article being moved for

trade or other purpose [FAO, 1990; revised ICPM, 2001]

consignment A quantity of plants, plant products and/or other articles being

moved from one country to another and covered, when required, by a single phytosanitary certificate (a consignment may be composed of one or more commodities or lots) [FAO,

1990; revised ICPM, 2001]

debarking Removal of bark from round wood (debarking does not

necessarily make the wood bark-free) [FAO, 1990]

dunnage Wood packaging material used to secure or support a

commodity but which does not remain associated with the commodity [FAO, 1990; revised ISPM Pub. No. 15, 2002]

emergency action A prompt phytosanitary action undertaken in a new or

unexpected phytosanitary situation [ICPM, 2001]

emergency measure A phytosanitary regulation or procedure established as a matter

of urgency in a new or unexpected phytosanitary situation. An emergency measure may or may not be a provisional measure

[ICPM, 2001]

free from (of a

consignment, field, or place

of production)

Without pests (or a specific pest) in numbers or quantities that can be detected by the application of phytosanitary procedures [FAO, 1990; revised FAO, 1995; CEPM, 1999]

fumigation Treatment with a chemical agent that reaches the commodity

wholly or primarily in a gaseous state [FAO, 1990; revised

FAO, 1995]

heat treatment The process in which a commodity is heated until it reaches a

minimum temperature for a minimum period of time according to an officially recognized technical specification [ISPM Pub.

No. 15, 2002]

infestation (of a commodity)

Presence in a commodity of a living pest of the plant or plant product concerned. Infestation includes infection [CEPM.

1997; revised CEPM, 1999)

interception (of a pest) The detection of a pest during inspection or testing of an

imported consignment (FAO, 1990; revised CEPM, 1996)

A process in which wood is dried in a closed chamber using kiln-drying

heat and/or humidity control to achieve a required moisture

content [ISPM Pub. No. 15, 2002]

mark An official stamp or brand, internationally recognized, applied

to a regulated article to attest its phytosanitary status [ISPM]

Pub. No. 15, 2002]

NPPO National Plant Protection Organization [FAO, 1990; ICPM,

2001]

official Established, authorized or performed by a National Plant

Protection Organization [FAO, 1990]

Pest Risk Analysis The process of evaluating biological or other scientific and

> economic evidence to determine whether a pest should be regulated and the strength of any phytosanitary measures to be

taken against it [FAO, 1990; revised IPPC, 1997]

phytosanitary action An official operation, such as inspection, testing, surveillance

treatment, undertaken to implement phytosanitary

regulations or procedures [ICPM, 2001]

phytosanitary measure

Any legislation, regulation or official procedure having the (agreed interpretation) purpose to prevent the introduction and/or spread of quarantine pests, or to limit the economic impact of regulated non-

quarantine pests [FAO, 1995; revised IPPC, 1997; ISC, 2001]

The agreed interpretation of the term phytosanitary measure accounts for the relationship of phytosanitary measures to regulated non-quarantine pests. This relationship is not adequately reflected in the definition found in Article II of the IPPC (1997).

phytosanitary procedure prescribed method implementing officially for

phytosanitary regulations including the performance of inspections, tests, surveillance or treatments in connection with regulated pests [FAO, 1990; revised FAO, 1995; CEPM, 1999;

ICPM, 2001]

phytosanitary regulation Official rule to prevent the introduction and/or spread of

quarantine pests, or to limit the economic impact of regulated non-quarantine pests, including establishment of procedures for phytosanitary certification [FAO, 1990; revised FAO, 1995;

CEPM, 1999; ICPM, 2001]

plant products Unmanufactured material of plant origin (including grain) and

those manufactured products that, by their nature or that of their processing, may create a risk for the introduction and spread of pests [FAO, 1990; revised IPPC, 1997; formerly

Plant product]

PRA Pest risk analysis [FAO, 1995]

processed wood material Products that are a composite of wood constructed using glue,

heat and pressure, or any combination thereof (ISPM Pub. No.

15, 2002]

quarantine pest A pest of potential economic importance to the area

endangered thereby and not yet present there, or present but not widely distributed and being officially controlled [FAO, 1990;

revised FAO, 1995; IPPC, 1997]

raw wood Wood which has not undergone processing or treatment [ISPM

Pub. No. 15, 2002]

regulated article Any plant, plant product, storage place, packaging,

conveyance, container, soil and any other organism, object or material capable of harbouring or spreading pests, deemed to require phytosanitary measures, particularly where international transportation is involved [CEPM, 1996; revised

CEPM, 1999; ICPM, 2001]

test Official examination, other than visual, to determine if pests

are present or to identify pests [FAO, 1990]

treatment Officially authorized procedure for the killing or removal of

pests or rendering pests infertile [FAO, 1990; revised FAO,

1995; ISPM Pub. No. 15, 2002]

wood A commodity class for round wood, sawn wood, wood chips or

dunnage, with or without bark [FAO, 1990; revised ICPM,

2001]

wood packaging material Wood or wood products (excluding paper products) used in

supporting, protecting or carrying a commodity (includes

dunnage) [ISPM Pub. No. 15, 2002]

OUTLINE OF REQUIREMENTS

Wood packaging material made of unprocessed raw wood is a pathway for the introduction and spread of pests. Because the origin of wood packaging material is often difficult to determine, globally approved measures that significantly reduce the risk of pest spread are described. NPPOs are encouraged to accept wood packaging material that has been subjected to an approved measure without further requirements. Such wood packaging material includes dunnage, but excludes processed wood packaging material.

Procedures to verify that an approved measure, including the application of a globally recognized mark, has been applied should be in place in both exporting and importing countries. Other measures agreed to under a bilateral arrangement are also considered in this standard. Wood packaging material that does not comply with the requirements of this standard should be disposed of in an approved manner.

REGULATORY REQUIREMENTS

1. Basis for Regulating

Wood packaging material is frequently made of raw wood that may not have undergone sufficient processing or treatment to remove or kill pests and therefore becomes a pathway for the introduction and spread of pests. Furthermore, wood packaging material is very often reused, recycled or re-manufactured (in that packaging received with an imported consignment may be re-used to accompany another consignment for export). The true origin of any piece of wood packaging material is difficult to determine and thus its phytosanitary status cannot be ascertained. Therefore the normal process of undertaking risk analysis to determine if measures are necessary and the strength of such measures is frequently not possible for wood packaging material because its origin and phytosanitary status may not be known. For this reason, this standard describes globally accepted measures that are approved and that may be applied to wood packaging material by all countries to practically eliminate the risk for most quarantine pests and significantly reduce the risk from a number of other pests that may be associated with that material.

Countries should have technical justification for requiring the application of the approved measures as described in this standard for imported wood packaging material. Requiring phytosanitary measures beyond an approved measure as described in this standard also requires technical justification.

2. Regulated Wood Packaging Material

These guidelines are for coniferous and non-coniferous raw wood packaging material that may serve as a pathway for plant pests posing a threat mainly to living trees. They cover wood packaging material such as pallets, dunnage, crating, packing blocks, drums, cases, load boards, pallet collars, and skids which can be present in almost any imported consignment, including consignments which would not normally be the target of phytosanitary inspection.

Wood packaging made wholly of wood-based products such as plywood, particle board, oriented strand board or veneer that have been created using glue, heat and pressure or a combination thereof should be considered sufficiently processed to have eliminated the risk associated with the raw wood. It is unlikely to be infested by raw wood pests during its use and therefore should not be regulated for these pests.

Wood packaging material such as veneer peeler cores¹, sawdust, wood wool, and shavings, and raw wood cut into thin² pieces may not be pathways for introduction of quarantine pests and should not be regulated unless technically justified.

3. Measures for Wood Packaging Material

3.1 Approved measures

Any treatment, process, or a combination of these that is significantly effective against most pests should be considered effective in mitigating pest risks associated with

¹ Veneer peeler cores are a by-product of veneer production involving high temperatures and comprising the center of a log remaining after the peeling process.

² Thin wood is considered to be formula to be f

² Thin wood is considered to be 6mm thickness or less according to the Customs Harmonized Commodity Description and Coding System (the Harmonized System or HS).

wood packaging material used in transport. The choice of a measure for wood packaging material is based on consideration of:

- the range of pests that may be affected
- the efficacy of the measure
- the technical and/or commercial feasibility.

Approved measures should be accepted by all NPPOs as the basis for authorizing the entry of wood packaging material without further requirements except where it is determined through interceptions and/or PRA that specific quarantine pests associated with certain types of wood packaging material from specific sources require more rigorous measures.

Approved measures are specified in Annex I.

Wood packaging material subjected to these approved measures should display a specified mark shown in Annex II.

The use of marks addresses the operational difficulties associated with the verification of compliance with treatment for wood packaging material. A universally recognized, non-language specific mark facilitates verification during inspection at the point of export, at the point of entry or elsewhere.

References for supporting documentation on approved measures are available from the IPPC Secretariat.

3.2 Measures pending approval

Other treatments or processes for wood packaging material will be approved when it can be demonstrated that they provide an appropriate level of phytosanitary protection (Annex III). The currently measures identified in Annex I continue to be under review, and new research may point, for example, to other temperature/time combinations. New measures may also reduce risk by changing the character of the wood packaging material. NPPOs should be aware that measures may be added or changed and should have sufficiently flexible import requirements for wood packaging to accommodate changes as they are approved.

3.3 Other measures

NPPOs may accept any measures other than those listed in Annex I by arrangement with their trading partners, especially in cases where the measures listed in Annex I cannot be applied or verified in the exporting country. Such measures should be technically justified and respect the principles of transparency, non-discrimination and equivalence.

The NPPOs of importing countries should consider other arrangements for wood packaging material associated with exports from any country (or particular source) where evidence is provided which demonstrates that the pest risk is adequately managed or absent (e.g. areas with similar phytosanitary situations or pest free areas).

Certain movements of wood packaging material (e.g. tropical hardwoods associated with exports to temperate countries) may be considered by the importing NPPO not to carry a phytosanitary risk and thus can be exempted from measures.

Subject to technical justification, countries may require that imported wood packaging material subjected to an approved measure be made from debarked wood and display a mark as shown in Annex II.

3.4 Review of measures

The approved measures specified in Annex I and the list of measures under consideration in Annex III should be reviewed based on new information provided to the Secretariat by NPPOs. This standard should be amended appropriately by the ICPM.

OPERATIONAL REQUIREMENTS

To meet the objective of preventing the spread of pests, both exporting and importing countries should verify that the requirements of this standard have been met.

4. Dunnage

Ideally, dunnage should also be marked in accordance with Annex II of this standard as having been subjected to an approved measure. If not, it requires special consideration and should, as a minimum, be made from bark-free wood that is free from pests and signs of live pests. Otherwise it should be refused entry or immediately disposed of in authorized manner (see section 6).

5. Procedures Used Prior to Export

5.1 Compliance checks on procedures applied prior to export

The NPPO of the exporting country has responsibility for ensuring that systems for exports meet the requirements set out in this standard. It includes monitoring certification and marking systems that verify compliance, and establishing inspection procedures (see also ISPM Pub. No. 7: Export certification system), registration or accreditation and auditing of commercial companies that apply the measures, etc.

5.2 Transit arrangements

Where consignments moving in transit have exposed wood packaging material that has not met the requirements for approved measures, the NPPOs of the transit countries may require measures in addition to those of the importing country to ensure that wood packaging material does not present an unacceptable risk.

6. Procedures upon Import

The regulation of wood packaging material requires that NPPOs have policies and procedures for other aspects of their responsibilities related to wood packaging material.

Since wood packaging materials are associated with almost all shipments, including those not normally the target of phytosanitary inspections, cooperation with agencies, organizations, etc. not normally involved with meeting phytosanitary export conditions or import requirements is important. For example, cooperation with Customs organizations should be reviewed to ensure effectiveness in detecting potential non-compliance of wood packaging material. Cooperation with the producers of wood packaging material also needs to be developed.

6.1 Measures for non-compliance at point of entry

Where wood packaging material does not carry the required mark, action may be taken unless other bilateral arrangements are in place. This action may take the form of treatment, disposal or refused entry. The NPPO of the exporting country may be notified (see ISPM Pub. No. 13: Guidelines on notification of non-compliance and emergency action). Where the wood packaging material does carry the required mark, and evidence of live pests is found, action can be taken. These actions may take the form of treatment, disposal or refused entry. The NPPO of the exporting country should be notified in cases where live pests are found, and may be notified in other cases (see ISPM Pub. No. 13: Guidelines on notification of non-compliance and emergency action).

6.2 Disposal

Disposal of wood packaging material is a risk management option that may be used by the NPPO of the importing country upon arrival of the wood packaging material where treatment is not available or desirable. The following methods are recommended for the disposal of wood packaging material where this is required. Wood packaging material that requires emergency action should be appropriately safeguarded prior to treatment or disposal to prevent escape of any pest between the time of the detection of the pest posing the threat and the time of treatment or disposal.

Incineration

Complete burning

Burial

Deep burial in sites approved by appropriate authorities. (Note: not a suitable disposal option for wood infested with termites). The depth of the burial may depend on climatic conditions and the pest, but is recommended to be at least 1 metre. The material should be covered immediately after burial and should remain buried.

Processing

Chipping and further processing in a manner approved by the NPPO of the importing country for the elimination of pests of concern (e.g. manufacture of oriented strand board).

Other methods

Procedures endorsed by the NPPO as effective for the pests of concern.

The methods should be applied with the least possible delay.

ANNEX I

APPROVED MEASURES ASSOCIATED WITH WOOD PACKAGING MATERIAL

Heat treatment (HT)

Wood packaging material should be heated in accordance with a specific time-temperature schedule that achieves a minimum wood core temperature of 56°C for a minimum of 30 minutes³.

Kiln-drying (KD), chemical pressure impregnation (CPI), or other treatments may be considered HT treatments to the extent that these meet the HT specifications. For example, CPI may meet the HT specification through the use of steam, hot water, or dry heat.

Heat treatment is indicated by the mark HT. (see Annex II)

Methyl bromide (MB) fumigation for wood packaging material

The wood packaging material should be furnigated with methyl bromide. The treatment is indicated by the mark MB. The minimum standard for methyl bromide furnigation treatment for wood packaging material is as follows:

Temperature	Dosage rate	Minimum concentration (g/m³) at:			
		0.5hrs.	2hrs.	4hrs.	16hrs.
21°C or above	48	36	24	17	14
16°C or above	56	42	28	20	17
11°C or above	64	48	32	22	19

The minimum temperature should not be less than 10°C and the minimum exposure time should be 16 hours.

List of most significant pests targeted by HT and MB

Members of the following pest groups associated with wood packaging material are practically eliminated by HT and MB treatment in accordance with the specifications listed above:

Pest group				
Insects				
Anobiidae				
Bostrichidae				
Buprestidae				
Cerambycidae				
Curculionidae				
lsoptera				
Lyctidae (with some exceptions for HT)				
Oedemeridae				
Scolytidae				
Siricidae				
Nematodes				
Bursaphelenchus xylophilus				

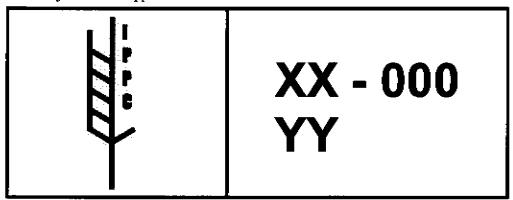
³ A minimum core temperature of 56° C for a minimum of 30 min. is chosen in consideration of the wide range of pests for which this combination is documented to be lethal and a commercially feasible treatment. Although it is recognized that some pests are known to have a higher thermal tolerance, quarantine pests in this category are managed by NPPOs on a case by case basis.

⁴ Certain countries require that the minimum commodity temp should be higher

ANNEX II

MARKING FOR APPROVED MEASURES

The mark shown below is to certify that the wood packaging material that bears the mark has been subjected to an approved measure.



The mark should at minimum include the:

- symbol
- ISO two letter country code followed by a unique number assigned by the NPPO to the producer of the wood packaging material, who is responsible for ensuring appropriate wood is used and properly marked
- IPPC abbreviation according to Annex I for the approved measure used (e.g. HT, MB).

NPPOs, producers or suppliers may at their discretion add control numbers or other information used for identifying specific lots. Where debarking is required the letters DB should be added to the abbreviation of the approved measure. Other information may also be included provided it is not confusing, misleading, or deceptive.

Markings should be:

- according to the model shown here
- legible
- permanent and not transferable
- placed in a visible location, preferably on at least two opposite sides of the article being certified.

The use of red or orange should be avoided since these colors are used in the labeling of dangerous goods.

Recycled, remanufactured or repaired wood packaging material should be re-certified and remarked. All components of such material should have been treated.

Shippers should be encouraged to use appropriately marked wood for dunnage.

ANNEX III

MEASURES BEING CONSIDERED FOR APPROVAL UNDER THIS STANDARD

Treatments⁵ being considered and which may be approved when appropriate data becomes available, include but are not limited to:

Fumigation

Phosphine Sulfuryl fluoride Carbonyl sulphide

CPI

High-pressure/vacuum process Double vacuum process Hot and cold open tank process Sap displacement method

Irradiation

Gamma radiation X-rays Microwaves Infra red Electron beam treatment

Controlled atmosphere

⁵ Certain treatments such as phosphine furnigation and some CPI treatments are generally believed to be very effective but at present lack experimental data concerning efficacy which would allow them to be approved measures. This present lack of data is specifically in relation to the elimination of raw wood pests present at the time of application of the treatment.

For further information on international standards, guidelines and recommendations concerning phytosanitary measures, and the complete list of current publications, please contact the:

SECRETARIAT OF THE INTERNATIONAL PLANT PROTECTION CONVENTION

By mail:

IPPC Secretariat

Plant Protection Service

Food and Agriculture Organization of the United Nations (FAO)

Viale delle Terme di Caracalla

00100 Rome, Italy

Fax: E-mail: +39-06-570.56347 ippc@fac.org

Website:

http://www.ippc.int

INTERNATIONAL STANDARDS FOR PHYTOSANITARY MEASURES (ISPMS)

International Plant Protection Convention, 1997, FAO, Rome.

ISPM Pub. No. 1: Principles of plant quarantine as related to international trade, 1995. FAO, Rome.

ISPM Pub. No. 2: Guidelines for pest risk analysis, 1996, FAO, Rome.

ISPM Pub. No. 3: Code of conduct for the import and release of exotic biological control agents, 1996. FAO, Rome.

ISPM Pub. No. 4: Requirements for the establishment of pest free areas, 1996. FAO, Rome.

ISPM Pub. No. 5: Glossary of phytosanitary terms, 1999. FAO, Rome.

Glossary Supplement No. 1: Guidelines on the interpretation and application of the concept of official control for regulated pests, 2001. FAO, Rome.

ISPM Pub. No. 6: Guidelines for surveillance, 1997, FAO, Rome.

ISPM Pub. No. 7: Export certification system, 1997. FAO, Rome.

ISPM Pub. No. 8: Determination of post status in an area, 1998, FAO, Rome.

ISPM Pub. No. 9: Guidelines for pest eradication programmes, 1998. FAO, Rome.

ISPM Pub. No. 10: Requirements for the establishment of pest free places of production and pest free production sites, 1999. FAO, Rome.

ISPM Pub. No. 11: Pest risk analysis for quarantine pests, 2001. FAO, Rome.

ISPM Pub. No. 12: Guidelines for phytosanitary certificates, 2001, FAO, Rome.

ISPM Pub. No. 13: Guidelines for the notification of non-compliance and emergency action, 2001. FAO, Rome.

ISPM Pub. No. 14: The use of integrated measures in a systems approach for pest risk management, 2002. FAO, Rome.

ISPM Pub. No. 15: Guidelines for regulating wood packaging material in international trade, 2002. FAO, Rome.

ISPM Pub. No. 16: Regulated non-quarantine pests: concept and application, 2002. FAO, Rome.

ISPM Pub. No. 17: Pest reporting, 2002. FAO, Rome.

GLOSSARY OF ACRONYMS

ALSC American Lumber Standards Committee

APHIS Animal and Plant Health Inspection Service

APS Army Prepositioned Stock

ARDEC Armament Research, Development and Engineering Center

ASC Army Sustainment Command
CBP Customs and Border Patrol
CCP Container Consolidation Point
CONUS Continental United States
CPI Chemical Pressure Impregnation
DDC Defense Distribution Center
DLA Defense Logistics Agency

DOD Department of Defense

DODAAC Department of Defense Activity Address Code

DPPG Defense Packaging Policy Group
DTS Defense Transportation System

EU European Union

EPA Environmental Protection Agency

HQDA Headquarters, Department of the Army

HT Heat Treatment

IPPC International Plant Protection Convention

ISPM International Standards for Phytosanitary Measures

JMC Joint Munitions Command

KD Kiln Dried

MACOM Major Command

MB Methyl Bromide

MLRC Munitions Logistics Readiness Center

NAVICP Naval Inventory Control Point

NPPO National Plant Protection Organization

NSN National Stock Number

NWPCA National Wood Pallet Container Association

OCONUS Outside Continental United States

PARC Principal Assistant Responsible for Contracting

POC Point of Contact
POD Port of Debarkation

SDR Supply Discrepancy Report

VIC Unit Identifier Code

UN United Nations

United States Department of Agriculture

WPM Wood Packaging Material